

**FILED - GR**

September 22, 2010 4:32 PM

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

TRACEY CORDES, CLERK  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
BY:                      /                      /                       
SCANNED BY:                      /                      /                     

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:08-CR-274

vs.

CHARLES JACKSON, JR.,  
WILLIE CORNELIUS JACKSON,  
SAMUEL AARON COLLINS,  
Also Known As "Duran Anthony Lloyd,"  
Also Known As "DuJuan Winston,"  
Also Known As "DuJuan Bell,"  
Also Known As "Steven Parker,"  
Also Known As "Lucio Garcia,"

Hon. Paul L. Maloney  
Chief United States District Judge

ROBERT EDWARD WILSON,  
OWUSU ANANEH FIREMPONG,  
REGINA Y. CAWTHORNE-SHARIFF,  
JAMES DYLAN HAYES,

**THIRD SUPERSEDING INDICTMENT**

Also Known As "Shawn Anthony Davis,"  
MARLAN MICAH McRAE,  
ALVIN MAURICE ANDERSON,  
Also Known As "Reece,"  
CAROLINE EPPS LOGAN,  
MARTELL D. LOGAN,  
SHARON LOGAN,  
ROBERTO JUAN FARIAS, JR.,  
Also Known As "Bobby,"  
ROBERTO ESPINOSA FARIAS,  
Also Known As "Juan Roberto Farias-Espinosa,"  
Also Known As "Roberto Juan Farias,"  
Also Known As "Ernesto Roberto Gusman,"  
SHATERRA CHARLESZETTA JACKSON,  
RORY JACKSON, and  
MARVIN SHELTON,

Defendants.

\_\_\_\_\_ /

The Grand Jury charges:

**COUNT ONE**

**(Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine)**

Beginning on or about an unknown date in the mid-1990s and continuing through on or about an unknown date in 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**CHARLES JACKSON, JR.,  
WILLIE CORNELIUS JACKSON,  
SAMUEL AARON COLLINS,  
Also Known As "Duran Anthony Lloyd,"  
Also Known As "DuJuan Winston,"  
Also Known As "DuJuan Bell,"  
Also Known As "Steven Parker,"  
Also Known As "Lucio Garcia,"  
ROBERT EDWARD WILSON,  
OWUSU ANANEH FIREMPONG,  
REGINA Y. CAWTHORNE-SHARIFF,  
JAMES DYLAN HAYES,  
Also Known As "Shawn Anthony Davis,"  
MARLAN MICAH McRAE,  
ALVIN MAURICE ANDERSON,  
Also Known As "Reece,"  
CAROLINE EPPS LOGAN,  
ROBERTO JUAN FARIAS, JR.,  
Also Known As "Bobby," and  
ROBERTO ESPINOSA FARIAS,  
Also Known As "Juan Roberto Farias-Espinosa,"  
Also Known As "Roberto Juan Farias,"  
Also Known As "Ernesto Roberto Gusman,"**

did combine, conspire, confederate, and agree together, and with Alvin Keith Jackson, Emond Durea Logan, Charles Jackson, Sr., Donnie Charles, Lindell Brown, Felicia Blake, Tamara Hughes, Kevin Emerson (a/k/a "Kenneth Coleman"), and other persons both known and unknown to the Grand Jury, to knowingly, intentionally and unlawfully distribute and possess

with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(ii)

**COUNT TWO**  
**(Money Laundering Conspiracy)**

Beginning on or about an unknown date in the mid-1990s and continuing through on or about December 2, 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**CHARLES JACKSON JR.,  
WILLIE CORNELIUS JACKSON,  
SAMUEL AARON COLLINS,  
Also Known As "Duran Anthony Lloyd,"  
Also Known As "DuJuan Winston,"  
Also Known As "DuJuan Bell,"  
Also Known As "Steven Parker,"  
Also Known As "Lucio Garcia,"  
ROBERT EDWARD WILSON,  
OWUSU ANANEH FIREMPONG,  
REGINA Y. CAWTHORNE-SHARIFF,  
JAMES DYLAN HAYES,  
Also Known As "Shawn Anthony Davis,"  
Also Known As "Shawn Anthony Davis,"  
MARLAN MICAH McRAE,  
ALVIN MAURICE ANDERSON,  
Also Known As "Reece,"  
SHATERRA CHARLESZETTA JACKSON,  
RORY JACKSON, and  
MARVIN SHELTON,**

knowing that the property involved represented the proceeds of some form of unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(1), that is, the distribution of cocaine and conspiracy to do the same, both felony offenses under Title 21, United States Code, Sections 841(a)(1) and 846, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together, and with Charles Jackson, Sr., Lindell Brown, Donnie Charles, Felicia Blake, Tamara Hughes, Kevin Emerson (a/k/a "Kenneth Coleman"), JAMES DYLAN HAYES, and other persons both known and unknown to the Grand Jury, to conduct and cause to be conducted

financial transactions which involved the proceeds of said unlawful activity, with intent to promote the carrying on of said unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the unlawful activity, and to avoid transaction reporting requirements under federal law.

### **Means and Methods**

During the course of this unlawful conspiracy, Charles Jackson, Sr., CHARLES JACKSON, JR., SAMUEL AARON COLLINS, Donnie Charles, Lindell Brown, and others procured thousands of kilograms of cocaine from the State of California that was delivered to and distributed in the Detroit, Michigan area, and elsewhere, for further redistribution in both the Eastern and Western Districts of Michigan, and elsewhere.

It was a further part of the unlawful conspiracy that at regular intervals, at least once or twice a month, Charles Jackson, Sr., SAMUEL AARON COLLINS, and Donnie Charles directed Kevin Emerson (a/k/a "Kenneth Coleman") to transport multiple-kilogram loads of cocaine from the State of California to the Detroit, Michigan area and elsewhere, using the United States interstate highways, including Interstate 94 in the Western and Eastern Districts of Michigan. After Kevin Emerson (a/k/a "Kenneth Coleman") arrived in the Detroit, Michigan area with the cocaine from California, he would meet with JAMES DYLAN HAYES, Lindell Brown, Felicia Blake, Tamara Hughes and others at various locations in the Detroit, Michigan area. At times during the course of the conspiracy, Kevin Emerson (a/k/a "Kenneth Coleman") delivered loads of cocaine to JAMES DYLAN HAYES at 37530 Jefferson Ave., Apt. #104, Harrison Township, Michigan ("the Harrison Township Condo"), the title for which was placed in the name of

“Kenneth Coleman” (Kevin Emerson’s alias) but the true owners of which were Charles Jackson, Sr., and JAMES DYLAN HAYES.

It was further part of the unlawful conspiracy that JAMES DYLAN HAYES redistributed the cocaine he received from Kevin Emerson (a/k/a “Kenneth Coleman”) to MARLAN MICAH McRAE, ALVIN MAURICE ANDERSON and others. After JAMES DYLAN HAYES, Lindell Brown, Felicia Blake, Tamara Hughes and others further distributed the cocaine, they collected the drug proceeds in the form of United States currency.

It was further part of the unlawful conspiracy that JAMES DYLAN HAYES, Lindell Brown, Felicia Blake, Tamara Hughes and others retained their profits from the sale of cocaine, but returned the bulk of the drug proceeds to Kevin Emerson (a/k/a “Kenneth Coleman”), who transported the drug proceeds, in the form of United States currency, back to Charles Jackson, Sr., SAMUEL AARON COLLINS, Donnie Charles and others in the State of California. This United States currency that Kevin Emerson (a/k/a “Kenneth Coleman”) transported to the State of California was used to pay for the cocaine previously obtained by the drug trafficking organization and for purchasing additional cocaine in the State of California, thus promoting the continued illicit distribution of cocaine in the State of Michigan and elsewhere. Typically the value of these loads of United States currency transported by Kevin Emerson (a/k/a “Kenneth Coleman”) ranged from several hundred thousand dollars to over \$1,000,000. Kevin Emerson (a/k/a “Kenneth Coleman”) was paid in cash for transporting the kilograms of cocaine and United States currency derived from the sale of the cocaine between the States of California and Michigan.

It was further part of the conspiracy that Charles Jackson, Sr., SAMUEL AARON COLLINS, JAMES DYLAN HAYES, OWUSU ANANEH FIREMPONG, Donnie Charles and others purchased with drug proceeds and/or provided Kevin Emerson (a/k/a “Kenneth Coleman”) with various motor vehicles, including minivans and motor homes, so that Kevin Emerson (a/k/a “Kenneth Coleman”) could transport the multiple-kilogram loads of cocaine to the State of Michigan and elsewhere, and transport the drug proceeds back to the State of California. Some of these vehicles that Kevin Emerson (a/k/a “Kenneth Coleman”) used to transport the cocaine and U.S. currency included:

- a 1995 Toyota Previa Minivan with VIN JT3AC14R0S1171553;
- a 1997 Toyota Previa Minivan with VIN JT3GK13M7V1247468;
- a 1998 Toyota Camry sedan with VIN JT2SV22W6J0209275;
- a 2000 Windstar Minivan with VIN 2FMZA5041YBC47571;
- a 1997 American Dream Motor Home with VIN 4V2BN1098VC023724;
- a 2000 Pace Arrow Motor Home with VIN 1FCNF53S5Y0A0224; and
- a 2003 Revolution Motor Home built on a Freightliner Chassis with VIN 4UZAABHS83CM0384.

At times while Kevin Emerson (a/k/a “Kenneth Coleman”) remained in the Detroit, Michigan area waiting for the cocaine to be sold and the drug proceeds collected, JAMES DYLAN HAYES provided him access to 37530 Jefferson Ave., Apt. #104, Harrison Township, Michigan (“the Harrison Township Condo”) and with a 1991 Oldsmobile Calais with VIN 1G3NL54UXMM059322, so that Kevin Emerson (a/k/a “Kenneth Coleman”) had lodging and transportation in the Detroit area while the cocaine was sold and the transport vehicle loaded with drug proceeds for the return trip to the State of California.

It was further part of the unlawful conspiracy that REGINA Y. CAWTHORNE-SHARIFF paid the storage bill for at least one of the motor homes used to transport the cocaine and drug proceeds between the States of Michigan and California. At various times during the course of the unlawful conspiracy, REGINA Y. CAWTHORNE-SHARIFF stocked the motor home with provisions for the trips to the State of Michigan and elsewhere with the cocaine, and she helped unload the duffle bags containing drug proceeds from the motor homes upon their return to the State of California. Moreover, on or about February 17, 2008, REGINA Y. CAWTHORNE-SHARIFF drove Donnie Charles to a location in Carson, California, where Donnie Charles delivered approximately \$80,000.00 in United States currency to his cocaine supplier.

It was further part of the unlawful conspiracy that Charles Jackson, Sr., CHARLES JACKSON, JR., SAMUEL AARON COLLINS and others used the United States Postal Service to send kilograms of cocaine from the State of California to various addresses in the Detroit, Michigan area, including a residence located at 12711 Wade Street, Detroit, Michigan, a residence owned by JAMES DYLAN HAYES. It was further part of the conspiracy that Charles Jackson, Sr., and SAMUEL COLLINS instructed others to use the United States Postal Service to send the drug proceeds back to them in the State of California, where the packages containing United States currency were sent to homes and businesses of others, in order to avoid detection by law enforcement.

It was further part of the unlawful conspiracy that Charles Jackson, Sr., CHARLES JACKSON, JR., WILLIE CORNELIUS JACKSON, OWUSU ANANEH FIREMPONG, JAMES DYLAN HAYES, MARLAN MICAHA McRAE, ALVIN MAURICE ANDERSON,



Donnie Charles and others used a portion of their drug proceeds to purchase real estate, businesses, motor vehicles, and other items of personal property. For example, during the course of the conspiracy, Charles Jackson, Sr., CHARLES JACKSON, JR., WILLIE CORNELIUS JACKSON, SHATERRA CHARLESZETTA JACKSON, MARVIN SHELTON, and Donnie Charles purchased, constructed, maintained, remodeled, refinanced, and made mortgage payments on the following properties and others, in whole or in part, with drug proceeds obtained from the unlawful sale of cocaine in the State of Michigan and elsewhere:

- 4588 Don Milagro, Los Angeles, California;
- 4230 Don Jose, Los Angeles, California;
- 1943 West 74<sup>th</sup> Street, Los Angeles, California;
- 3745 Lorado Way, Los Angeles, California;
- 4607 3<sup>rd</sup> Avenue, Los Angeles, California;
- 2800 6<sup>th</sup> Avenue (also referred to as 2800 54<sup>th</sup> Street), Los Angeles, California;
- 1061 West 111<sup>th</sup> Street, Los Angeles, California;
- 1063 West 111<sup>th</sup> Street, Los Angeles, California;
- 1603 West 209<sup>th</sup> Street, Torrance, California, to include 20821-20823 Harvard, Torrance, California, which are buildings now located on the property;
- 715 West Rosecrans, Compton, California;
- 4900 South Van Ness Avenue, Los Angeles, California;
- 5411 6<sup>th</sup> Avenue, Los Angeles, California;
- 5419 6<sup>th</sup> Avenue, Los Angeles, California;

- 5912 West Blvd., Los Angeles, California;
- 7620 S. Western, Los Angeles, California;
- 10232 Victoria, Riverside, California;
- 11915 Willowbrook, Los Angeles, California;
- 12201 South Vermont, Los Angeles, California, to include 1002-1004 West 112nd Street, which are buildings now located on the property;
- 19441 Radlett, Carson, California;
- 11846-50 S. Normandie, Los Angeles, California;
- 8936 Haas Avenue, Los Angeles, California;
- 19506 Fariman, Carson, California; and
- 10318 St. Andrews Place, Los Angeles, California.

Charles Jackson, Sr., CHARLES JACKSON, JR., and Donnie Charles purchased these properties, and later transferred ownership of several of these properties between themselves, to other co-conspirators and nominees including WILLIE CORNELIUS JACKSON and RORY JACKSON, and to corporations they control, in order to conceal the true source, nature, and ownership of the funds involved in the real estate transactions, as these funds were derived, in whole or in part, from the sale of cocaine in the State of Michigan and elsewhere. In addition to real property, Charles Jackson, Sr., and MARVIN SHELTON, titled other assets purchased with drug proceeds, including motor vehicles and boats, in nominee names, including RORY JACKSON.

Similarly, it was further part of the conspiracy that JAMES DYLAN HAYES and MARLAN MICAH McRAE purchased, refinanced, and made mortgage payments on the

following properties, in whole or in part, with drug proceeds obtained from the unlawful sale of cocaine in the State of Michigan:

- 37530 Jefferson Ave., Apt. #104, Harrison Township, Michigan (“the Harrison Township Condo”);
- 48714 Tanglewood Dr., Macomb, Michigan;
- 21973 International Lane, Macomb, Michigan; and
- 5480 Seneca Street, Detroit Michigan.

JAMES DYLAN HAYES and MARLAN MICAH McRAE purchased these properties using documents provided to financial institutions which falsely portrayed the source of the funds used to purchase the properties in order to conceal the true source, nature, and ownership of the funds involved in the real estate transactions, as these funds were derived, in whole or in part, from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the conspiracy that Charles Jackson, Sr., JAMES DYLAN HAYES, ROBERT EDWARD WILSON and/or others provided fraudulent documents, including fake W-2 tax forms and employment documents, to other co-conspirators and to financial institutions for the purchase and transfer of some of these properties in both the States of California and Michigan, including fraudulent documents used for the purchase of 37530 Jefferson Ave., Apt. #104, Harrison Township, Michigan (“the Harrison Township Condo”) by “Kenneth Coleman” (alias for Kevin Emerson) in May of 2001.

It was further part of the conspiracy that JAMES DYLAN HAYES used proceeds from the sale of cocaine to purchase commercial real estate and operate business entities including Executive Auto Sales, Inc., a used car business located at 10333 and 10351 Gratiot Avenue,

Detroit, MI. JAMES DYLAN HAYES used these businesses and others to conceal the true source, nature, and ownership of the funds involved in the purchase and operation of these businesses, as these funds were derived, in whole or in part, from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the unlawful conspiracy that the defendants used accounts at banks and other financial institutions to conceal the true source, nature and ownership of the United States currency they acquired from the sale of cocaine in the State of Michigan and elsewhere. For example, between January 14, 2003 and March 16, 2009, JAMES DYLAN HAYES made 144 large cash deposits totaling more than \$961,000 into a JP Morgan Chase Bank account ending in number "4693," which he controlled. Similarly, between January 1, 2003 and January 27, 2009, JAMES DYLAN HAYES made 73 individual cash deposits totaling \$226,391 into a JP Morgan Chase Bank account ending in number "8235," which he controlled. All of these cash deposits into both accounts were under \$10,000 with the maximum cash deposit being \$9,900. Several transactions involving the JP Morgan Chase Bank account ending in number "4693" show cash deposits of just under \$10,000 with money orders being purchased and deposited on the same day, all in an attempt to avoid the filing of currency transaction reports by financial institutions as required by law, and to conceal the true source, nature and ownership of the United States currency involved in these transactions, which was derived from the sale of cocaine in the State of Michigan and elsewhere.

Similarly, WILLIE CORNELIUS JACKSON, CHARLES JACKSON, JR., and SHATERRA CHARLESZETTA JACKSON opened and/or controlled corporate bank accounts tied to various parcels of real property purchased, constructed, maintained, and remodeled, in whole or in part, with drug proceeds obtained from the unlawful sale of cocaine in the State of

Michigan and elsewhere. WILLIE CORNELIUS JACKSON, CHARLES JACKSON, JR., and SHATERRA CHARLESZETTA JACKSON used funds deposited into these corporate bank accounts to pay personal expenses for themselves and other family members, including Charles Jackson, Sr., who was a federal fugitive from a 1998 indictment from the Eastern District of Michigan.

It was further part of the unlawful conspiracy that JAMES DYLAN HAYES, ALVIN MAURICE ANDERSON and others submitted false and fraudulent loan applications for the purchase of automobiles and other items of personal property, in order to conceal the true source, nature and ownership of the United States currency involved in these transactions, which was derived from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the unlawful conspiracy that the CHARLES JACKSON JR., WILLIE CORNELIUS JACKSON, Charles Jackson, Sr., MARVIN SHELTON, and others committed and attempted to commit insurance fraud involving property or properties purchased, constructed, maintained and remodeled with funds derived from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the unlawful conspiracy that the defendants either failed to file federal tax returns and/or filed fraudulent or misleading federal tax returns for the tax years 2002 through 2008, in order to hide and conceal their illegal proceeds from the sale of cocaine in the State of Michigan and elsewhere.

18 U.S.C. § 1956(h)  
18 U.S.C. § 1956(a)(1)(A)(i)  
18 U.S.C. § 1956(a)(1)(B)(i)  
18 U.S.C. § 1956(a)(1)(B)(ii)  
18 U.S.C. § 1957

**COUNT THREE**  
**(Money Laundering Conspiracy)**

Beginning on or about an unknown date in 2004 and continuing through in or about September 2009, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**CAROLINE EPPS LOGAN,  
MARTELL D. LOGAN and  
SHARON LOGAN**

knowing that the property involved represented the proceeds of some form of unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(1), that is, the distribution of cocaine and conspiracy to do the same, both felony offenses under Title 21, United States Code, Sections 841(a)(1) and 846, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together, and with Emond Durea Logan, Alvin Keith Jackson, Lindell Brown, Felicia Blake, Tamara Hughes and others, both known and unknown to the Grand Jury, to conduct and cause to be conducted financial transactions which involved the proceeds of said unlawful activity, with intent to promote the carrying on of said unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the unlawful activity, and to avoid transaction reporting requirements under federal law.

**Means and Methods**

It was part of the unlawful conspiracy that Lindell Brown, Alvin Keith Jackson, Felicia Blake, Tamara Hughes and others operated a large-scale drug distribution organization which involved the procurement of thousands of kilograms of cocaine from the State of California, and the delivery of said cocaine to the Detroit, Michigan area, for distribution in both the Eastern and Western Districts of Michigan, and elsewhere.

It was a further part of the unlawful conspiracy that, once or twice a month from in or about April 2004 through in or about January 2007, Emond Durea Logan used a tractor-trailer to transport multiple-kilogram quantities of cocaine from the State of California to the Detroit, Michigan area and elsewhere, using interstate highways, including Interstate 94 in the Western and Eastern Districts of Michigan. After Emond Durea Logan arrived in the Detroit, Michigan area with the cocaine, Alvin Keith Jackson would meet with Emond Durea Logan at various locations, including a truck-related business located at 3000 Williams Road in Ypsilanti, Michigan, for the purpose of retrieving the cocaine from Emond Durea Logan. After retrieving the cocaine from Emond Durea Logan, Alvin Keith Jackson would transport the cocaine to various locations in the Detroit, Michigan area, including a residence owned by Felicia Sabrina Blake located at 22521 Carleton Avenue, Southfield, Michigan 48033, where the cocaine was unloaded by Alvin Keith Jackson, Lindell Brown, and others, for distribution to and by various drug trafficking organizations, including AHH DEE AHH, which operated in the Lansing, Michigan area from 2001 through 2006.

It was further part of the unlawful conspiracy that Alvin Keith Jackson, Lindell Brown, and others at their direction, collected or arranged for the collection, counting and packaging of large amounts of United States currency derived from the sale of the cocaine in the Lansing and metropolitan Detroit areas, and elsewhere. After the United States currency was counted, vacuum-sealed, and packaged, Alvin Keith Jackson delivered the United States currency to Emond Durea Logan at various locations in the Detroit, Michigan area, including a truck-related business located at 3000 Williams Road in Ypsilanti, Michigan. Emond Durea Logan then transported the United States currency in his tractor-trailer back to the State of California via the interstate highway system, including Interstate 94 in both the Eastern and Western Districts of Michigan. The United States currency that Emond Durea Logan transported to the State of California was used to pay for cocaine previously obtained by the drug trafficking organization

and for purchasing additional cocaine in California, thus promoting the continued illicit distribution of cocaine in the State of Michigan and elsewhere. Typically, these loads of United States currency transported by Emond Durea Logan ranged from several hundred thousand dollars to over \$1,000,000. Emond Durea Logan was paid in cash derived from the sale of the cocaine.

It was further part of the unlawful conspiracy that Emond Durea Logan and his wife, CAROLINE EPPS LOGAN, used Emond Durea Logan's portion of the drug proceeds to pay for and maintain various motor vehicles, including a tractor-trailer, pay the mortgage for their residence located at 19058 Springbrook Court, Riverside, California 92508, credit card bills, and other expenses. Beginning in or about April 2004, Emond Durea Logan began making large cash deposits, typically ranging from \$9,000 to \$9,800, into various financial institutions in an attempt to avoid the filing of currency transaction reports by financial institutions as required by law, and to conceal the true source, nature and ownership of the United States currency involved in these transactions, which was derived from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the unlawful conspiracy that on or about Memorial Day weekend (late May) in 2006, Emond Durea Logan informed at least one co-conspirator that a load of United States currency from the State of Michigan was confiscated from him by law enforcement in another state on his way back to the State of California. Shortly thereafter, Emond Durea Logan began making large cash deposits into accounts he and CAROLINE EPPS LOGAN controlled in two or more financial institutions. On twenty-one (21) days between May 30, 2006, and November 15, 2006, Emond Durea Logan made 62 large cash deposits ranging from \$1,500 to \$9,800 and totaling \$527,200 into accounts he controlled in two financial institutions. These large cash deposits typically ranged from \$9,000 to \$9,800. Emond Durea Logan, and others on his behalf, structured these large cash deposits in an attempt to avoid the filing of currency transaction reports by financial institutions as required by law, and to conceal the true source,



nature and ownership of this United States currency, which was derived from the sale of cocaine in the State of Michigan and elsewhere.

It was a further part of the unlawful conspiracy that Emond Durea Logan, and others at his direction, including CAROLINE EPPS LOGAN, MARTELL D. LOGAN, and SHARON LOGAN, deposited funds into various financial institutions to purchase and lease motor vehicles and to conduct other financial transactions, while concealing the true source, nature and ownership of the funds involved in these transactions, which were derived from the sale of cocaine in the State of Michigan and elsewhere.

It was further part of the unlawful conspiracy that Emond Durea Logan and CAROLINE EPPS LOGAN would utilize funds in these financial institutions to pay their mortgage held by World Savings Bank on their residence located at 19058 Springbrook Court, Riverside, California 92508, and that in or about August 2006 Emond Durea Logan and CAROLINE EPPS LOGAN used \$177,000 of these funds derived from the sale of cocaine in the State of Michigan and elsewhere to pay off this mortgage.

It was a further part of the unlawful conspiracy that Emond Durea Logan, CAROLINE EPPS LOGAN, MARTELL LOGAN, and SHARON LOGAN would take large amounts of cash derived from the organization's sale of cocaine and: (1) deposit the cash into various bank accounts or direct others to make the deposits; and (2) purchase cashier's checks and money orders or direct others to make such purchases. These funds would then be used to purchase assets and pay personal expenses with the goal of concealing the true source, nature and ownership of the funds.

It was a further part of the unlawful conspiracy that during the course of the conspiracy Emond Durea Logan and/or CAROLINE EPPS LOGAN purchased the following

vehicles, in whole or in part, with proceeds from the sale of cocaine in the State of Michigan and elsewhere:

A 2008 Ford Mustang with Vehicle Identification Number  
1ZVHT82H285157391;

A 2007 Maserati Quattroporte with Vehicle Identification Number  
ZAMCE39A670027835;

A 2004 Porsche Cayenne with Vehicle Identification Number  
WP1AB29P04LA66271;

A 2010 Ford Mustang with Vehicle Identification Number  
1ZVBP8CH9A5116707;

A 2007 Volvo semi tractor-trailer with Vehicle Identification  
Number 4V4NC9TJ17N457049;

A 2007 Lexus RX350 with Vehicle Identification Number  
2T2GK31U77C005333;

A 2006 Chrysler 300 with Vehicle Identification Number  
2C3KA53G66H192383;

A 2007 Mercedes Benz SL 500R with Vehicle Identification Number  
WDBSK71FO7F128632;

A Zieme Trailer with Vehicle Identification Number 1ZCS14011W304061; and

A 2009 Great Dane Trailer with Vehicle Identification Number  
1GRAA06209T548382.

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(A)(i)

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1956(a)(1)(B)(ii)

18 U.S.C. § 1957

**(Forfeiture Allegation)**

The Grand Jury realleges the conspiracy charges in this Third Superseding Indictment as though fully set forth herein. Upon conviction of the controlled substance and/or money laundering offense charged in this Third Superseding Indictment, the defendants,

**CHARLES JACKSON, JR.,  
WILLIE CORNELIUS JACKSON,  
SAMUEL AARON COLLINS,  
Also Known As "Duran Anthony Lloyd,"  
Also Known As "DuJuan Winston,"  
Also Known As "DuJuan Bell,"  
Also Known As "Steven Parker,"  
Also Known As "Lucio Garcia,"  
ROBERT EDWARD WILSON,  
OWUSU ANANEH FIREMPONG,  
REGINA Y. CAWTHORNE-SHARIFF,  
JAMES DYLAN HAYES,  
Also Known As "Shawn Anthony Davis,"  
MARLAN MICAH McRAE,  
ALVIN MAURICE ANDERSON,  
Also Known As "Reece,"  
CAROLINE EPPS LOGAN,  
MARTELL D. LOGAN,  
SHARON LOGAN,  
ROBERTO JUAN FARIAS, JR.,  
Also Known As "Bobby,"  
ROBERTO ESPINOSA FARIAS,  
Also Known As "Juan Roberto Farias-Espinosa,"  
Also Known As "Roberto Juan Farias,"  
Also Known As "Ernesto Roberto Gusman,"  
SHATERRA CHARLESZETTA JACKSON,  
RORY JACKSON, and  
MARVIN SHELTON,**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from proceeds obtained, directly or indirectly, as a result of the violation of the Controlled Substances Act in Count One of this Third Superseding Indictment, and any and all property used or intended to be used, in any manner or part, to commit or to facilitate the

commission of the violation set forth in Count One; and shall forfeit, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the violation of the money laundering offenses set forth in Counts Two and Three of this Third Superseding Indictment, and any property traceable to such property, including but not limited to the following:

1. ACCOUNTS

- a. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX4693, in the name of Executive Auto Sales, Inc./"JAMES HAYES" (**"Account #1"**);
- b. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX8235, in the name of "JAMES HAYES" (**"Account #2"**);
- c. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX5591, in the names of WILLIE CORNELIUS JACKSON, Lois Jackson or Charles Jackson (**"Account #3"**);
- d. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX6780, in the name of WILLIE CORNELIUS JACKSON (**"Account #4"**);
- e. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX8540 in the name of WILLIE CORNELIUS JACKSON (**"Account #5"**);
- f. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9811, in the name of Casa Don Jose, Inc. (**"Account #6"**);
- g. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX8706, in the name of Casa Don Milagro, Inc. (**"Account #7"**);
- h. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX6150, in the name of WILLIE CORNELIUS JACKSON (**"Account #8"**);
- i. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9803, in the name of Rosetta 111<sup>th</sup> and Rosecrans Corp. (**"Account #9"**);
- j. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9837, in the name of Rosetta 3<sup>rd</sup> and Van Ness Corp. (**"Account #10"**);

- k. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9613, in the name of Rosetta 209<sup>th</sup> and Western Corp. (**"Account #11"**);
- l. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9639, in the name of Rosetta 54<sup>th</sup> and 6<sup>th</sup> Avenue Corp. (**"Account #12"**);
- m. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9829, in the name of Rosetta West Blvd. and Vermont Corp. (**"Account #13"**);
- n. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9621, in the name of Rosetta Willowbrook Plus Corp. (**"Account #14"**);
- o. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX9605, in the name of Rosetta 69<sup>th</sup> and St. Andrew Corp. (**"Account #15"**);
- p. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX3508, in the name of CCW Assets Management Ltd. (**"Account #16"**);
- q. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX3483, in the name of CCW Assets Management Ltd. (**"Account #17"**);
- r. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX3516, in the name of CCW Assets Management Ltd. (**"Account #18"**);
- s. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXX2551, in the name of CCW Assets Management Ltd. (**"Account #19"**);
- t. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXXXX7758 in the name CCW Asset Management Ltd. (**"Account #20"**);
- u. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXXXX3532 in the name CCW Asset Management Ltd. (**"Account #21"**);
- v. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXXXX3524 in the name CCW Asset Management Ltd. (**"Account #22"**);
- w. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXXXX3475 in the name CCW Asset Management Ltd. (**"Account #23"**);
- x. Any and all funds in JP Morgan Chase Bank account ending in the numbers XXXXXX5102 in the name CCW Asset Management Ltd. (**"Account #24"**);

- y. Any and all funds in JP Morgan Chase Bank account number N17-501727 in the name of Willie C. Jackson, Willie and L. Jackson Trust ("**Account #25**");
- z. Any and all funds in JP Morgan Chase Bank account number 000004953421628, in the name of CHARLES JACKSON, JR. ("**Account #26**");
- aa. Any and all funds in One United Bank account number 1002638592 in the name of CHARLES JACKSON, JR. ("**Account #27**");
- bb. Any and all funds in One United Bank account number 1002265303 in the name of Worldwide Auto Sales ("**Account #28**");
- cc. Any and all funds in NuVision Federal Credit Union account number 449401749, in the name of WILLIE C. JACKSON ("**Account #29**");
- dd. Any and all funds in NuVision Federal Credit Union account number 451625915, in the name of Lois Jackson ("**Account #30**");
- ee. Any and all funds in Bank of America account number 23621-01361, in the names of Lois Jackson and WILLIE C. JACKSON ("**Account #31**");
- ff. Any and all funds in Bank of America account number 21743-40484, in the name Marvin C. Shelton ("**Account #32**");
- gg. Any and all funds in Bank of America account number 21740-76671, in the name of Marvin C. Shelton ("**Account #33**");
- hh. Any and all funds in Broadway Federal Bank account number 730073124, in the name of Lois Jackson ("**Account #34**");
- ii. Any and all funds in Broadway Federal Bank account number 730073728 in the name Willie Jackson ("**Account #35**");
- jj. Any and all funds in Broadway Federal Bank account number 710297311, in the name of WILLIE C. JACKSON ("**Account #36**");
- kk. Any and all funds in Western Federal Credit Union account number 2009660, in the name of WILLIE C. JACKSON ("**Account #37**");
- ll. Any and all funds in AIG Annuity Ins. Co account number VV270737, in the name of WILLIE C. JACKSON ("**Account #38**");

- mm. Any and all funds in AIG Annuity Ins. Co account number NN088610, in the name of WILLIE C. JACKSON (**"Account #39"**);
- nn. Any and all funds in Western National Life Insurance Company account number VV270737, in the name of WILLIE C. JACKSON (**"Account #40"**);
- oo. Any and all funds in ING, ReliaStar Life Insurance Company account number B1992050, in the name of Lois Jackson, Insured Rory Jackson (**"Account #41"**);
- pp. Any and all funds in ING, ReliaStar Life Insurance Company account number B1992051, in the name of Lois Jackson, insured Willie C. Jackson, Jr. (**"Account #42"**);
- qq. Any and all funds in SAFECO Life and Investments annuity account number LP1076145, in the name of WILLIE C. JACKSON (**"Account #43"**);
- rr. Any and all funds in JP Morgan Chase account number 000000716102025 in the name of Executive Properties Enterprise LLC (**"Account #44"**);
- ss. Any and all funds in Comerica Bank account number 1852519014 in the name of Executive Auto Sales Inc. (**"Account #45"**);
- tt. Any and all funds in FAA First Federal Credit Union account number 56362 in the name of Stacy Jackson (**"Account #46"**);
- uu. Any and all funds in Wells Fargo Bank Checking Account ending in the numbers XXXXX2635, in the name of EMOND D. LOGAN dba Executive Transporting (**"Account #47"**);
- vv. Any and all funds in Wells Fargo Checking Account ending in the numbers XXXXXX5039, in the names of EMOND D. LOGAN and Caroline Epps (**"Account #48"**);
- ww. Any and all funds in Wells Fargo Savings Account ending in the numbers XXXXXX9432, in the name of Caroline Epps (**"Account #49"**);
- xx. Any and all funds in Wells Fargo Savings Account ending in the numbers XXX-XXX3464, in the name of EMOND D. LOGAN dba Executive Transporting (**"Account #50"**);
- yy. Any and all funds in Wescom Credit Union, combined checking and money market Account ending in the number XX5664, in the name of EMOND LOGAN (**"Account #51"**);

zz. Any and all funds in JP Morgan Chase money market account number 411-878400001-1 in the name of Caroline Logan (**"Account #52"**);

aaa. Any and all funds in Wescom Credit Union account ending in the number XX9216, in the names of MARTELL LOGAN and SHARON LOGAN (**"Account #53"**);

2. VEHICLES

a. One 1995 Toyota Previa Minivan, VIN JT3AC14R0S1171553 (**"Vehicle #1"**);

b. One 1997 Toyota Previa Minivan, VIN JT3GK13M7V1247468 (**"Vehicle #2"**);

c. One 2000 Windstar Minivan, VIN 2FMZA5041YBC47571 (**"Vehicle #3"**);

d. One 1997 American Dream Motor Home, VIN 4VZBN1098VC023724 (**"Vehicle #4"**);

e. One 2003 Revolution Motor Home built on a Freightliner Chassis, VIN 4UZAABHS83CM03804 (**"Vehicle #5"**);

f. One 2003 Lexus SC430, VIN JTHFN48Y330036099 (**"Vehicle #6"**);

g. One 2006 BMW, VIN WBAEK13436CN78697 (**"Vehicle #7"**);

h. One 2002 Mercedes Benz, VIN WDBRH64J62F150831 (**"Vehicle #8"**);

i. One 1996 Eliminator (boat), VIN ELBU0321C696 (**"Vehicle #9"**);

j. One 1994 Chevrolet pickup truck, VIN 1GCHC33N5RJ327018 (**"Vehicle #10"**);

k. One 2003 GMC Yukon SUV, VIN 1GKFK66U53J183318 (**"Vehicle #11"**);

l. One 2009 GMC Yukon SUV, VIN 1GKFK06269J120426 (**"Vehicle #12"**);

m. One 2008 Chevrolet Malibu, VIN 1G1ZH57B984267252 (**"Vehicle #13"**);

n. One 1949 Chevrolet pickup, VIN SGPC7445 (**"Vehicle #14"**);

o. One 2004 Rance Trailer, VIN 4PVCH20234E020390 (**"Vehicle #15"**);

p. One 2004 Honda Motorcycle, VIN 1HFSC53J14A000208 (**"Vehicle #16"**);



- q. One 2006 Harley Davidson, VIN 1HD1FCW186Y638493 (**"Vehicle #17"**);
- r. One 1996 Chevrolet Caprice, VIN 1G1BL52P5TR156051 (**"Vehicle #18"**);
- s. One 2000 Freightliner wrecker, VIN 1FV3EFAC5YHB77710 (**"Vehicle #19"**);
- t. One 2006 International wrecker, VIN 1HTMMAAL96H223946 (**"Vehicle #20"**);
- u. One 2002 Toyota Sequoia, VIN 5TDBT48A52S105542 (**"Vehicle #21"**);
- v. One 2003 Mercury Marauder, VIN 2MEHM75V43X677805 (**"Vehicle #22"**);
- w. One 1999 Honda Accord, VIN 1HGCG164XXA054775 (**"Vehicle #23"**);
- x. One 1998 Toyota Camry, VIN JT2BF22K0W0145137 (**"Vehicle #24"**);
- y. A 1998 Buick Park Avenue with VIN 1G4CW52K8W4620356 (**"Vehicle #25"**);
- z. A 2000 Ford Taurus with VIN 1FAFP5528YA202142 (**"Vehicle #26"**);
- aa. A 2001 Chrysler Sebring with VIN 1C3EL46X21N617451 (**"Vehicle #27"**);
- bb. A 2004 Honda Odyssey with VIN 2HKRL1859YH575538 (**"Vehicle #28"**);
- cc. A 2000 Cadillac DeVille with VIN 1G6KD54YXYU168195 (**"Vehicle #29"**);
- dd. A 1990 Mercury Grand Marquis with VIN 2MECM74F9LX668568 (**"Vehicle #30"**);
- ee. A 2001 Ford Taurus with VIN 1FAHP53U01G232400 (**"Vehicle #31"**);
- ff. A 2005 Pontiac Grand Prix with VIN 2G2WP522551287644 (**"Vehicle #32"**);
- gg. A 2000 Chevrolet Impala with VIN 2G1WF52E9Y9338716 (**"Vehicle #33"**);
- hh. A 2002 Ford Explorer with VIN 1FMXU73E02UA93489 (**"Vehicle #34"**);

- ii. A 1997 Dodge Caravan with VIN 2B6HB21Y9VK500729  
("Vehicle #35");
- jj. A 1998 Lexus E8300 with VIN JT8BF28G0W5028489 ("Vehicle #36");
- kk. A 2001 Dodge Neon with VIN 1B3ES46C71D135853  
("Vehicle #37");
- ll. A 2000 Ford Windstar with VIN 2FMZA5244YBC92100  
("Vehicle #38");
- mm. A 1998 Chevrolet Venture with VIN 1GN DU06E5WD334896 ("Vehicle #39");
- nn. A 2000 Ford Taurus with VIN 1FAFP52U7YA253704  
("Vehicle #40");
- oo. A 1999 Mazda Protege with VIN JM1BJ2217X0157848  
("Vehicle #41");
- pp. A 2002 Kia Sedona with VIN KND0P131226116341 ("Vehicle #42");
- qq. A 2000 Chevrolet Venture with VIN 1GN DU06E5W0334896 ("Vehicle #43");
- rr. A 2000 Chevrolet Express Van with VIN 1GCHG35R7Y1160051  
("Vehicle #44");
- ss. A 2007 Kaufman trailer with serial number 15XFE47357L003674  
("Vehicle #45");
- tt. A 1997 Chevrolet van with VIN 1GCHG35R6V1062818  
("Vehicle #46");
- uu. A 1998 Yamaha Wave Runner with VIN YAMA1329L798  
("Vehicle #47");
- vv. A 2000 Seadoo (boat) with VIN ZZN58381D999 ("Vehicle #48");
- ww. A 1998 GMC pickup truck with VIN 1GTG034F9W2539X1  
("Vehicle #49");
- xx. A 2000 Bobcat front end loader with VIN 512264612 ("Vehicle #50");

- yy. A 1999 Honda Accord with VIN 1HGCG6658XA033179 (**"Vehicle #51"**);
- zz. A trailer (for watercraft) with serial number 6408201 (**"Vehicle #52"**);
- aaa. A 2003 Freightliner with VIN 1FVJAPCK03DL81549 (**"Vehicle #53"**);
- bbb. A 1999 Harley Davidson motorcycle with VIN 1HD1FCW37XY623907 (**"Vehicle #54"**);
- ccc. A 2003 Harley Davidson motorcycle with VIN 1HD1FRW503Y702074 (**"Vehicle #55"**);
- ddd. A 2005 Harley Davidson motorcycle with VIN 1HD1JAB345Y087116 (**"Vehicle #56"**);
- eee. A 2003 Warlock/Ultralock 28-foot boat, white, with VIN: UTCSX607G900 and hull number MC 8369PZ, with trailer (**"Vehicle #57"**);
- fff. A 2005 Harley Davidson motorcycle with VIN 1HD1BYB115Y077213 (**"Vehicle #58"**);
- ggg. A 2004 Harley Davidson motorcycle with VIN 1HD1FCW394Y604366 (**"Vehicle #59"**);
- hhh. A 2007 Maserati Quattroporte with Vehicle Identification Number ZAMCE39A670027835 (**"Vehicle #60"**);
- iii. A 2010 Ford Mustang with Vehicle Identification Number 1ZVBP8CH9A5116707 (**"Vehicle #61"**);
- jjj. A 2007 Volvo semi tractor trailer with Vehicle Identification Number 4V4NC9TJ17N457049 (**"Vehicle #62"**);
- kkk. A 2007 Lexus RX350 with Vehicle Identification Number 2T2GK31U77C005333 (**"Vehicle #63"**);
- lll. A 2006 Chrysler 300 with Vehicle Identification Number 2C3KA53G66H192383 (**"Vehicle #64"**);
- mmm. A 2007 Mercedes Benz SL 500R with Vehicle Identification Number WDBSK71FO7F128632 (**"Vehicle #65"**);

nnn. A Zieme Trailer with Vehicle Identification Number 1ZCS14011W304061 ("Vehicle #66"); and

ooo. A 2009 Great Dane Trailer with Vehicle Identification Number 1GRAA06209T548382 ("Vehicle #67").

3. REAL PROPERTY

- a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 19441 Radlett Avenue, Carson, California, County of Los Angeles, more particularly described as:

Lot 127 of tract 29681, as per map recorded in book 739, pages 30 to 32 inclusive, of maps in the office of the County Recorder of Los Angeles County.

APN: 7322-017-037.

Owner: The Ralph and Mae Charles Living Trust. ("Property #1");

- b. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 12201 South Vermont Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

The north 45 feet of lots 10, 11 and 12, in block "J" in the townsite of Howard Tract, in the County of Los Angeles, State of California, as per map recorded in book 22, page 59 of seq. of miscellaneous records in the office of the County Recorder of said county.

APN: 6089-012-007

Owner: Rosetta West Blvd. and Vermont Corp., a California corporation. ("Property #2");

- c. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 11915 Willowbrook Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 132 of Springdale Tract in the County of Los Angeles, State of California, as per map recorded in book 6, page 194 of maps in the office of the County Recorder of said county.

APN: 6150-007-027.

Owner: Rosetta Willowbrook Plus Corp., a California corporation.  
("Property #3");

- d. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 7620 South Western Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

Lots 8, 9, and 10, block 17 of tract no. 6757, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 76, pages 35 and through 38 inclusive of maps, in the office of the County Recorder of said county.

APN: 6018-017-031.

Owner: Rosetta 209<sup>th</sup> and Western Corp. ("Property #4");

- e. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5912 West Boulevard, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 88 of tract 2095, in the City of Los Angeles, County of Los Angeles, State of California as per map recorded in book 23, page 22 of maps in the office of the County Recorder of said county.

Except the easterly 20 feet thereof conveyed to the City of Los Angeles, for alley purposes, by deed recorded in book 933 page 172, official records.

APN: 4004-015-004.

Owner: Rosetta West Blvd. and Vermont Corp. ("Property #5");

- f. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5159 South St. Andrews Place, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 115 of Chesterfield Square as per map recorded in book 21 pages 90 and 91 of maps, in the office of the County Recorder of said county.

APN: 5015-009-007.

Owner: Rosetta 69<sup>th</sup> and St. Andrews Corp. ("Property #6");

- g. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4900 S. Van Ness Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 82 of St. Vincents College Tract, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 12, pages 118 and 119 of maps, in the office of the County Recorder of said county.

APN: 5015-023-010.

Owner: Rosetta 3<sup>rd</sup> and Van Ness Corp. ("**Property #7**");

- h. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 715 West Rosecrans, Compton, California, County of Los Angeles, more particularly described as:

TRACT # 6468 E 39.07 FT EX OF ST OF LOT 4 AND EX OF ST LOT 5  
BLK 2

Parcel No.: 6178-003-002.

Owner: Rosetta 111<sup>th</sup> and Rosecrans Corp. ("**Property #8**");

- i. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1603 West 209<sup>th</sup> Street, Torrance, California, County of Los Angeles, more particularly described as:

Lot 13, block 43 of tract 4983, in the City of Los Angeles (Torrance Area), County of Los Angeles, State of California as per map recorded in book 58, page(s) 80 to 85, inclusive of maps in the office of the County Recorder of said county.

APN: 7351-010-013.

Owner: Rosetta 209<sup>th</sup> and Western Corp. ("**Property #9**");

- j. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1061 West 111<sup>th</sup> Street, Los Angeles, California, County of Los Angeles, more particularly described as:

The southerly 150 feet of lot 14, Woodcrest Tract, in the County of Los Angeles, State of California, as per map recorded in book 9, page 40 of maps, in the office of the County Recorder of said county.

APN: 6076-013-020.

Owner: Rosetta 111<sup>th</sup> and Rosecrans Corp. ("**Property #10**");

- k. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2800 6<sup>th</sup> Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

Lots 32, 33 and 34 of the east 18 feet of lot 35 of tract no. 1610, as per map recorded in book 20, page 85 of maps in the office of the County Recorder of said county.

APN: 5006-023-033.

Owner: Rosetta 54<sup>th</sup> and 6<sup>th</sup> Avenue Corp. ("**Property #11**");

- l. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4607 3<sup>rd</sup> Avenue, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 95 of tract 1700 in the City of Los Angeles, County of Los Angeles, as per map recorded in book 22, page 29 of maps, in the office of the County Recorder of said county.

Except all oil, naphtha, maltha gas, or other kindred substances deposited in, lying under or flowing through said property as reserved in deed from Los Angeles Investment Company, a corporation recorded April 11, 1918 in book 6644 page 158 of deeds.

APN: 5014-027-011.

Owner: Rosetta 3<sup>rd</sup> and Van Ness Corp. ("**Property #12**");

- m. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 3745 Lorado Way, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 51 of tract 6177, in the City of Los Angeles, County of Los Angeles, California as per map recorded in book 144, page(s) 77 through 81, inclusive of maps in the office of the County Recorder of said county.

APN: 5012-027-004.

Owner: Owusu Firempong, a single man. ("**Property #13**");

- n. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1943 West 74<sup>th</sup> Street, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 16, in block 7, of tract no. 5107, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 54 pages 67 to 70 inclusive of maps, in the office of the County Recorder of said county.

APN: 6017-007-016.

Owner: Peggy Dalcour, a single woman. ("**Property #14**");

- o. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4230 Don Jose Drive, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 100 of tract no. 20871, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in book 619, pages 93 through 96, inclusive of maps, in the office of the County Recorder of said county.

APN: 5028-012-013.

Owner: Casa Don Jose, Inc. ("**Property #15**");

- p. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4588 Don Milagro Drive, Los Angeles, California, County of Los Angeles, more particularly described as:

Lot 100 of tract no. 17455, in the City of Los Angeles, in the County of Los Angeles, State of California, as per map recorded in book 542, pages 33 through 36 inclusive of maps, in the office of the County Recorder of said county.

Except therefrom all petroleum, oil, gas, naptha, asphaltum, brea and other hydrocarbons and all minerals within or underlying said land, without, however, any right to re-enter or use the surface of said land or any portion of the subsurface thereof to a depth of 200 feet from the present surface of said land, as reserved by Dextra Baldwin Derx, Baldwin M. Baldwin and Raymond L. Knisley, as trustees under the trust created by the last will and



testament of Anita M. Baldwin, deceased, in the deed recorded April 22, 1947 in book 24497 page 230, official records.

APN: 5028-017-015.

Owner: Casa Don Milagro, Inc. ("**Property #16**");

- q. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 21973 International Lane, Macomb, Michigan, County of Macomb, more particularly described as:

Lot(s) 30, Towngate Subdivision, according to the plat thereof as recorded in Liber 137, Page(s) 34, 35, 36, 37, 38, 39 and 40 of Plats, Macomb County Records.

APN: 08-35-151-016.

Owner: Marlan M. McRae, a single man. ("**Property #17**");

- r. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 37530 Jefferson, #104, Harrison Township, Michigan, County of Macomb, more particularly described as:

Unit 63, Harbor Club North Condominium, according to the Master Deed recorded in Liber 9472, Page(s) 518 through 580, inclusive, and any amendments thereto, Macomb County Records, and designated as Macomb County Condominium Subdivision Plan No. 657, together with rights in general common elements and limited common elements, as set forth in the above Master Deed and as described in Act 59 of the Public Acts of 1978, as amended.

APN: 12-29-204-063.

Owner: James Hayes, a single man. ("**Property #18**");

- s. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 48714 Tanglewood Drive, Macomb, Michigan, County of Macomb, more particularly described as:

Lot(s) 26, Sycamore Estates No. 1, according to the plat thereof as recorded in Liber 155 of Plats, Page(s) 64, Macomb County Records.

APN: 08-26-126-007.

Owner: JAMES DYLAN HAYES, as Trustee of the Revocable Living Trust of JAMES DYLAN HAYES dated July 30, 2007. ("**Property #19**");

- t. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5480 Seneca, Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 6, Stephenson-Trebein Company's Subdivision, according to the plat thereof as recorded in Liber 27, Page(s) 48 of Plats, Wayne County Records.

APN: 17-006743.

Owner: Executive Properties Enterprises LLC. ("**Property #20**");

- u. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4893 Chatsworth, Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 1, Arthur J. Scully's Rifle Range Subdivision, according to the plat thereof as recorded in Liber 45, Page(s) 34 of Plats, Wayne County Records.

APN: 21-69028.

Owner: Executive Properties Enterprises LLC. ("**Property #21**");

- v. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 10300 and 10351 Gratiot Avenue, Detroit, Michigan, County of Wayne, more particularly described as:

Parcel 1: Lots 1 through 10, both inclusive, Edgewood Subdivision, according to the plat thereof as recorded in Liber 15, page(s) 83 of Plats, Wayne County Records.

Parcel 2: Lot 14, except the east 100 feet and that part taken for Gratiot Avenue, as widened, Bessenger & Moore's Gratiot Avenue Subdivision No. 2, according to the plat thereof as recorded in Liber 28, page(s) 30 of Plats, Wayne County Records.

APN: 19-1773 through 19-1779 and 19-1598.

Owner: Executive Properties Enterprises LLC. ("**Property #22**");

- w. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 10333 Gratiot

Avenue (as to Lots 12 and 13) and 10341 Gratiot Avenue (as to Lot 14), Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 12, 13 and 14, except Gratiot as widened, Alfred M. Lows Gratiot Avenue Subdivision, according to the plat thereof as recorded in Liber 17, Page(s) 69 of Plats, Wayne County Records.

APN: 19-001771 and 19-001772.

Owner: Executive Properties Enterprises LLC. ("**Property #23**");

- x. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 12711 Wade, Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 612, Ravendale Subdivision No. 1, according to the plat thereof as recorded in Liber 46, Page(s) 72 of Plats, Wayne County Records.

APN: 21-6287

Owners: James Hayes, a single man, and Sandra Chatman, a single woman. ("**Property #24**");

- y. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 16130 Whitcomb, Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 50, Puritan Greenfield Subdivision of the South 1/2 of the Southwest 1/4 of the Northwest 1/4 of Section 18, Town 1 South, Range 11 East, City of Detroit, Wayne County, Michigan, as recorded in Liber 51, Page(s) 8 of Plats, Wayne County Records.

APN: 22-047548.003L.

Owner: Executive Properties Enterprises LLC ("**Property #25**");

- z. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 16161 Roselawn, Detroit, Michigan, County of Wayne, more particularly described as:

Lot(s) 166, McIntyre Park Subdivision, according to the plat thereof as recorded in Liber 44, Page(s) 12 of Plats, Wayne County Records.

APN: 16-30787.

Owner: James Hayes, a married man, and Twyla Cabil Hayes, his wife. ("**Property #26**");

- aa. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 8936 Haas Avenue, Los Angeles, California, Los Angeles County, more particularly described as:

Lot 32 of Tract 11772 in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 219, Page 3 and 4 of Maps in the Office of the County Recorder of said County.

APN: 6036-023-008.

Owner: Stacey Jackson, A Single Woman. ("**Property #27**");

- bb. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 11846-50 S. Normandie, Los Angeles, California, Los Angeles County, more particularly described as:

The portion of Lot(s) 17 of Tract No. 15735, in the County of Los Angeles, State of California, as per map recorded in Book 378, Page(s) 7 and 8 of Maps, in the Office of the County Recorder of Said County, Lying Westerly of a Line Parallel with and Distant Easterly 53.00 Feet, Measured at right angles form the Tangent Portion of the Prologation of the Westerly Line of said Lot 17.

APN: 6079-011-020.

Owner: Rosetta 69<sup>th</sup> and St. Andrews Corp. ("**Property #28**"); and

- cc. 19058 Springbrook Court, Riverside California 92508-6283, more fully described as: The land situated in the State of CA, County of Riverside, City of Riverside, and described as follows:

Lot 45 of Tract No. 28628, as shown by map on file in Book 285 Pages 34 through 38 inclusive of Maps, records of Riverside County, California.

APN: 266-491-012-1

Owner: Caroline Epps-Logan and Emond D. Logan, wife and husband as joint tenants ("**Property #29**").

4. PERSONAL PROPERTY

- a. The following items of personal property seized and removed from 19058 Springbrook Court, Riverside California 92508-6283, a residence owned by

EMOND DUREA LOGAN and CAROLINE EPPS-LOGAN, on or about September 11 and 14, 2009, including but not limited to:

1. Three Rolex Watches and assorted items of jewelry;
  2. Three fur coats and a fur wrap;
  3. Sixty-three designer handbags and pieces of designer luggage; and
  4. United States currency in the amount of \$7,535.00, now in the form of a Bank of America Cashier's Check.
- b. The following items of personal property seized and removed from MARLAN McRAE's residence, located at 21973 International, Macomb, MI, on or about December 2, 2009, including but not limited to:
1. One Rolex watch and assorted items of jewelry;
  2. Eight (8) fur coats;
  3. U.S. currency in the amount of \$14,372, now in the form of a Comerica Bank Cashier's Check #00553166;
  4. U.S. Savings Bonds in various denominations; and
  5. Foreign currency.
- c. United States currency in the amount of \$56,314 seized from the residence of JAMES DYLAN HAYES located at 48714 Tanglewood, Macomb, MI and from his safe deposit box located at Comerica Bank on or about December 2 and 3, 2009, and now the form of a Comerica Bank Cashier's Check #00553165.
- d. United States currency in the amount of \$440 seized from the residence of ALVIN ANDERSON after his arrest on or about December 2, 2009, and now in the form of a Comerica Bank Cashier's Check #00553167.
- e. United States currency in the amount of \$30,011 seized from the residence of Sandy Yamamoto and Marvin Shelton during the search of their home on or about December 2, 2009, and now in the form of a Bank of America cashier's check.

- f. United States currency in the amount of \$19,200, now in the form of two Bank of America cashier's checks, and U.S. Savings Bonds in various denominations, seized from the residence of WILLIE CORNELIUS JACKSON during the search of his home located at 4230 Don Jose, Los Angeles, California, on or about December 2, 2009.
- g. U.S. Savings Bonds in various denominations and assorted rare coins seized from MARLAN McRAE's safe deposit box at 5th/3rd Bank on or about December 3, 2009.

5. MONEY JUDGMENT

By virtue of the commission of the controlled substance offense contained in Count One of this Third Superseding Indictment, the defendants shall forfeit to the United States the sum of \$136,000,000.00, which sum represents the aggregate of monies received in exchange for their involvement in the sale and distribution of cocaine, and constitutes proceeds derived from the sale and distribution of cocaine or which are traceable thereto.

6. SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


It is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

21 U.S.C. §§ 853(a) and (p)  
21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 982(a)(1) and (b)(1)  
18 U.S.C. § 1956(a) and (h)  
18 U.S.C. § 1957  
28 U.S.C. § 2461(c)

A TRUE BILL

  
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GRAND JURY FOREPERSON

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